

Baron v Argos Limited

Claim Number 673MC457

Reply to defence

1) The defence filed by Argos is frivolous and vexatious; it is an attempt to “blind with science” and was clearly drafted to intimidate an inexperienced litigant. I am sorry to have to disappoint Argos but I have sued successfully before in both the county court and the High Court as a litigant-in-person. In any case, it is my understanding from personal experience as well as research that county courts do not impose Draconian penalties on parties for minor errors provided said parties are acting in good faith.

2) This defence contains a number of claims that are either wilfully misleading or based on a misreading of my statement of claim. I will now address these.

3) Re paragraph 4, I did not fail to send a letter before action. I may not have styled my correspondence with Argos and Chris Stockton as such but they (plural) are clearly letters before action. These are documents “argos-letter-april-29”, “argos-stockton-2” and “argos-stockton-4”. If Mr Muhammed has not yet read them, I suggest he does so now.

4) Re paragraph 5, this claim does not centre around the return of a memory stick, rather it centres around the ATTEMPTED RETURN of TWO MEMORY STICKS, and again I would refer to “argos-letter-april-29” which makes this clear. The refusal of Mr Stockton to compensate me after being given sufficient time is proof of bad faith. Furthermore, as I set out exactly what had happened prior to my writing to him (Complaints Department) he could have investigated the matter with a phone call or two. Instead, he told me, figuratively, to pound sand.

5) Paragraph 6 is absurd. Mr Stockton was given plenty of time to come to a proper resolution; “argos-stockton-4” was sent May 9; he ignored that e-mail so on June 1, I issued my writ. He had three weeks to resolve my complaint but chose to ignore it.

6) Re paragraphs 8 & 9, the particulars of claim are not unclear and incoherent; they do disclose a cause of action. Mr Muhammed has all the documents filed with the Court. I would suggest he reads them.

7) Re paragraphs 14 & 16, I have provided proof of purchase. Document “argos-4” is an extract from my bank statement which shows two purchases at Argos, Penge; the second is for the defective memory sticks (plural). I have also verified this document herein by my statement of truth. If Mr Muhammed is suggesting this document is somehow faked, the onus is on him to prove it. Having said that, I would refer him to documents “argos-2” and “argos-3” which are scans of the actual memory sticks complete with store identification barcodes. I still have these memory sticks and when I received the judgment in this action, I will gladly return them to Argos at the hearing.

8) The claim that I have provided no evidence the memory sticks (plural) were faulty, is frivolous. I have stated so in this claim and have affirmed that claim by its statement of truth. If Mr Muhammed recalls, Argos, Penge refused to allow the return of the memory sticks and refund my money, so any purported lack of proof is their fault and Mr Stockton’s.

I would add that while most memory sticks (but not this brand) are sound, failures of this fragile technology are far from uncommon. I no longer purchase memory sticks on eBay because of this.

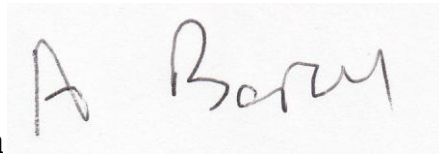
9) The claim in paragraph 22 that county courts do not generally award costs for time, effort and research by litigants-in-person is true, but these are exceptional circumstances and I feel both that I should be compensated and that Argos should be punished for its persistent unreasonable behaviour. In the first instance, the store could have refunded my money. In the second instance, Mr Stockton could have authorised this and an additional £30. Now, Mr Muhammed has compounded this indignity by again failing to accede to my reasonable demands.

10) Paragraph 24 is frivolous and demonstrably false. The Defendant did not act in accordance with consumer law. Furthermore, the Claimant did produce proof of purchase, and again I would refer the Court to documents “argos-2” and “argos-3”.

11) Paragraph 25 is frivolous; I submit if this case comes to court I will prove my claim, so it should not be dismissed.

12) Paragraph 26 is frivolous.

Statement of truth: I believe the facts stated in this claim are true.

A handwritten signature in black ink on a light gray background. The signature consists of a large, stylized capital letter 'A' followed by the word 'Baron' in a cursive script.

Signed A Baron

July 4, 2025